

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,¹

Reorganized Debtor.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

RE: D.I. 1851 and 1885

**CERTIFICATION OF NO OBJECTION REGARDING LITIGATION
TRUSTEE'S MOTION TO MODIFY PROTECTIVE ORDER**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or otherwise responsive pleading to the *Litigation Trustee's Motion to Modify Protective Order* [D.I. 1851] (the “**Motion**”) or the *Supplemental Notice of Litigation Trustee's Motion to Modify Protective Order* [D.I. 1885] (the “**Supplemental Notice**”). The undersigned further certifies that he has reviewed the docket of the United States Bankruptcy Court for the District of Delaware (the “**Court**”) in these cases, and no answer or other responsive pleading to the Motion appears thereon.

Pursuant to the notice filed with the Motion, any objections or other responses to the Motion were to be filed with the Court and served on undersigned counsel on or before September 19, 2025 at 4:00 p.m. (Eastern) and any objections or other responses to the Supplemental Notice were to be filed with the Court and served on undersigned counsel on or before October 27, 2025 at 4:00 p.m. (Eastern).

¹ The last four digits of Franchise Group, Inc.'s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. In addition to the foregoing Reorganized Debtor, the “Reorganized Debtors” include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FRG/>. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

WHEREFORE, counsel for the Litigation Trustee respectfully requests that the proposed form of order, as filed with the Motion, be entered at the earliest convenience of the Court.

Dated: October 28, 2025

RAINES FELDMAN LITTRELL LLP

/s/ Mark W. Eckard

Thomas J. Francella, Jr. (No. 3835)

Mark W. Eckard (No. 4542)

824 North King Street, Suite 805

Wilmington, DE 19801

(302) 772-5803

tfrancella@raineslaw.com

meckard@raineslaw.com

- and -

Hamid R. Rafatjoo (*pro hac vice*)

4675 MacArthur Court, Suite 1550

Newport Beach, CA 92660

Telephone: (310) 440-4100

Email: hrafatjoo@raineslaw.com

- and -

David S. Forsh (*pro hac vice*)

1350 Avenue of the Americas, 22nd Floor

New York, NY 10019

Telephone: (917) 790-7100

Email: dforsh@raineslaw.com

Counsel to the Litigation Trustee